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ABSTRACT

Written for the social service (Title XX) administrator at the State or sub-State level, this guide is intended to serve four major purposes: (1) Provide selected insights into what the Comprehensive Employment and Training Act (CETA) is and how it works; (2) point out potential areas for coordination which, from study or field experience, hold the promise of benefit to the clients and administrators both CETA and social services; (3) present a brief and practical analytical framework for identifying other arrangements; and (4) review the key management techniques that have proven their value in negotiation and implementation of Title XX/CETA coordination projects. Major topics include a summary of CETA provisions and Title XX program comparisons, some specific suggested opportunities for coordination (e.g. on child day care services, in youth employment programs for dropouts, and essential steps in identification and implementation of worthwhile cooperative arrangements. An illustrative agreement is appended. (WL)

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Title XX and CETA
A Coordination Guide for Title XX Administrators

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Note to the Reader:
Subsequent to the typesetting of this guide, but prior to final printing, the name of the Community Services Administration, the agency responsible for Federal action on Title XX, was changed to the *Public* Services Administration. Wherever the former appears within, please substitute the latter.

Chapter One
Introduction

This guide has been written for the Social Services (Title XX) administrator at the state or sub-state level. It is intended to serve four major purposes:

1. Provide selected insights into what the Comprehensive Employment and Training Act (CETA) is and how it works;

2. Point out potential areas for coordination which, from study or field experience, hold the promise of benefit to the clients and administrators of both CETA and Social Services;

3. Present a brief and practical analytical framework for identifying other arrangements;

4. Review the key management techniques that have proven their value in negotiation and implementation of Title XX/CETA coordination projects.

We Aren't Going to Define Coordination

Interprogram coordination is not defined specifically in this guide. Enough varying definitions already exist to fill a volume larger than this. You are simply encouraged by the Department of Health, Education, and Welfare and by the Department of Labor to work together with CETA programs and other appropriate HEW-related programs. In seeking ways to work together you are likely to discover opportunities to better serve your clients, CETA clients, and the interests of both agencies. When you find ways to do so, you will have achieved the goals of coordination without great concern for whether you have satisfied any particular definition.

Coordination for its own sake has no particular value. What matters are the results of coordination and how they serve the interests of all concerned. Arrangements which emanate from this effort will not be judged on the basis of their scope, scale, complexity, or formality. Simple efforts can yield significant results.

Coordinate at Your Discretion

Moreover, this document is not a mandate for coordination. It is instead an invitation to explore interprogram activities as the means to achieving one or more of your own program objectives. Not all forms of coordination are desirable; the costs of some coordination options will be too high. Where the ideas and methods described here appear attractive to you, pursue them. Where they do not, continue to look for ones that do. This guide recognizes fully that the decision to coordinate is yours.

The Secretaries of Health, Education, and Welfare and the Department of Labor, and the Commissioner of the Community Services Administration, support any legitimate actions you may take in working together which benefit your clients and your agencies and therefore the taxpayer.

A Critical Assumption

The approach taken in this guide regards as too simplistic, rather than axiomatic, that "what is good for the client is good for the agency." While this is generally true, agency administrators may find themselves equally attracted to an opportunity that benefits the agency as well as the client. Agency objectives and management priorities exist in addition to program objectives for meeting client needs. To the extent that agency and program objectives are mutually supportive, they form a productive relationship.

Those who neglect this aspect will miss significant opportunities to strengthen client service because those certain opportunities will come to light through pursuit of agency or leadership objectives, yet they may elude the analyst looking only for additional client benefits. Administrators are often faced with budget, staff, performance, and other problems which coordination might help resolve.

Accordingly, this guide recommends a simultaneous review of agency and leadership objectives, by both Title XX and CETA, as a legitimate step in the identification of coordination arrangements that ultimately will strengthen client services.

Find Opportunities

This guide offers insights into a process designed to help you find attractive opportunities to work together with CETA. The steps in that process are as follows:

—Acquiring knowledge about CETA;

—Assessing your program's own needs or unmet objectives;

—Analyzing areas of commonality where CETA might fit your program's needs;

—Discovering possible opportunities to coordinate with CETA;

—Weighing the costs and benefits of coordination; and, if applicable,

—Negotiating and implementing a joint project.

The chapters in this guide are organized accordingly.

Why Coordinate With CETA

Title XX and CETA are intended to service remarkably similar purposes. Economic self-support for their clients is a goal common to each program. Title XX and CETA also serve overlapping client groups: CETA focuses on the unemployed, the underemployed and the economically disadvantaged, which include many clients eligible for Title XX services, e.g., welfare recipients and low-income individuals. Many of the services provided in both programs are similar or complementary. Both programs have broad authority to designate their own service priorities and many planning functions of each agency are similar.

Finally, Title XX and CETA programs currently face a perplexing issue, the need to obtain self-sustaining employment for their dependent clients, which coordination can help to resolve.

The Importance of Leadership

Interprogram coordination can represent a significant challenge to the management skills of program leadership. First, coordination initiatives represent *change* and organizations typically do not change comfortably without artistic exercise of leadership. Second, coordination initiatives with substantial potential *gains* will always involve substantial *risk*, which some in the organization may perceive as intolerably high. If both Title XX and CETA leadership prepare properly, however, the risks associated with contemplated coordination arrangements can be identified early and openly discussed. Where the risks are acceptable to both Title XX and CETA leadership, there remains a third challenge: gaining consensus among the counterpart staffs, at the client service level if client service coordination is at issue, that the risk is acknowledged, that steps have been taken to reduce it, and that the residual risk is viewed as acceptable in relation to potential advantages.

Open and unequivocal commitment of the leadership of both agencies or programs is absolutely essential for the success of any coordination strategy.

The opportunities, problems and issues of interprogram coordination as they are identified and discussed in this guide are framed as leadership concerns. The approach proposed for searching out mutually appealing coordination arrangements assumes from the outset that the focus is on ways to preserve agency strengths, to improve agency performance, to enhance agency services, and to keep exposure to risk within tolerable limits. Of course, these are also primary concerns of CETA Prime Sponsor leadership.

In addition to this guide, the Department of Health, Education, and Welfare has produced four others, in similar format, whose contents vary according to the intended readership:

Education and CETA—A Coordination Guide for Adult Education and Vocational Educational Administrators

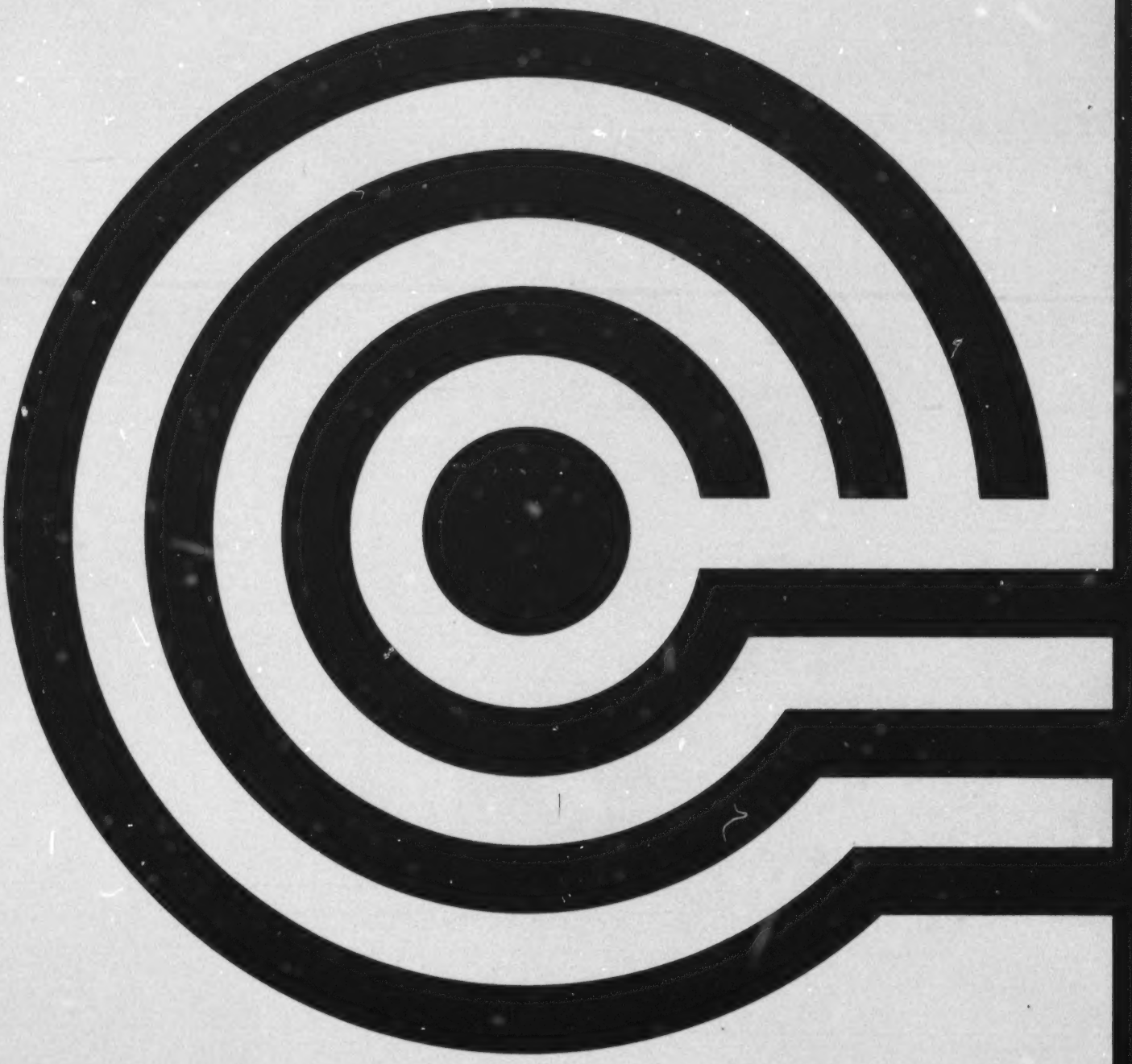
Vocational Rehabilitation and CETA—A Coordination Guide for VR Administrators

Health and CETA—A Coordination Guide for Health Administrators

CETA and HEW Programs—A Coordination Guide for Prime Sponsors.

This volume and the first three listed above provide an overview of CETA and discuss coordination opportunities from the HEW-funded program operator's perspective. The last volume describes working of HEW-funded programs and reviews coordination opportunities with those programs from the CETA Prime Sponsor's perspective. All the guides share a common organization.

Chapter Two
A CETA Summary and Title XX Program Comparisons



The following summary of CETA legislation, regulations, programming and issues is designed to give social services personnel (planners, administrators and providers) a general orientation to the manpower training, work experience, employment, and support services funded through CETA. There exist many common and complementary features within the CETA and Title XX programs. These commonalities offer the basis for possible coordination linkages between CETA and Title XX. In the following chapter the commonalities and differences between CETA and Title XX will be highlighted as a first step in the process of seeking mutually attractive coordination arrangements between these programs within your state or locality. Throughout the CETA summary, appropriate Title XX information has been inserted (in italics) to specify areas for comparative program analysis.

Background

The Comprehensive Employment and Training Act (CETA) (Public Law 93-205) was passed and signed in December 1973, decentralizing manpower programs throughout the nation to the state, county and city levels. An outgrowth of the "New Federalism" concepts of the early 1970's, CETA represents the belief that solutions to local manpower problems are best developed at the local level. Federal regulations governing Title I and II of CETA were published in the *Federal Register*, Vol. 40, Number 101, issued May 23, 1975. A subsequent publication (August 12, 1975) contains regulations for Title III programs. The applicable Title VI regulations were published on January 10, 1975.

Need for CETA Legislation

Prior to the passage of CETA, manpower programs were categorical in nature, designed in Washington and administered locally to serve specified segments of the population in a prescribed manner. These programs included the Concentrated Employment Program (CEP), Neighborhood Youth Corps (NYC), Operation Mainstream, New Careers, and vocational training under the Manpower Development and Training Act (MDTA). The coordination of these programs was attempted through the Comprehensive Manpower Planning Systems (CAMPS). It worked well in some locations, but it became obvious to Congress that for most states and communities the most appropriate way to deliver diverse manpower services was through program consolidation. Complicating service coordination and delivery, these categorical programs were operated by various agencies and organizations within the same locality and were funded by several different Federal agencies. Further complicating the picture, the Chief Elected Officials (CEOs) of jurisdictions where the programs were operating seldom had authority over their design and operations.

In order to make manpower resources more responsive to diverse local needs and to integrate more efficiently all manpower resources emanating from the Department of Labor, CETA consolidated most prior manpower programs under the control of the Chief Elected Official. Control brought with it the responsibility for program planning, implementation, operations and evaluation.

The term "Prime Sponsor" is used throughout this guide and refers to a unit of government (e.g., state, county or city), combinations of units of government or an eligible rural Concentrated Employment Program grantee which has a grant with the Department of Labor to provide comprehensive manpower services under CETA. For further explanation see "Role of the CETA Lead Agency" on page 15.

Purpose of CETA

As stated in the legislation, the purpose of CETA is to: "provide job training and employment opportunities for economically disadvantaged, unemployed, and underemployed persons, and to assure that training and other services lead to maximum employment opportunities and enhance self-sufficiency by establishing a flexible and decentralized system of Federal, state, and local programs."

The Congress had in mind three major changes for the national manpower network: (1) decision-making was decentralized to CEOs, (2) programming was decategorized so as to permit maximum local flexibility, and (3) consolidation was promoted as a coordination and/or integration theme for locally administered programs.

To achieve these broad purposes, the CETA legislation was organized into seven titles, each with a different emphasis:

Program Title	Description	FY 1976 Appropriations (in millions)
Title I Comprehensive Manpower Services	The primary manpower development title under CETA. The emphasis in Title I is on the provision of training, manpower, or supportive services leading to employment not subsidized by the act. Title I replaces prior categorical manpower programs.	$1,580
Title II Public Employment Programs	Creates public employment programs in areas of high unemployment. Emphasis is placed on transitional subsidized positions in the public sector which will lead to permanent unsubsidized employment for the participants.	$400
Title III Special Federal Programs and Responsibilities	Administered directly by the Department of Labor, unlike programs under the other Titles which are administered under grants to Chief Elected Officials. Title III gives the Secretary of Labor authority and funds to deal with special target groups, special manpower problems, and special geographic areas to provide manpower training, related assistance and supportive services. Additional funds are provided for research and evaluation studies.	$191
Title IV Job Corps	Retains the Job Corps as a Federally sponsored manpower program for the disadvantaged.	$225 (including $50 M in FY '75 carry-over funds)
Title V National Commission for Manpower Policy	Charged with reviewing and making recommendations on national manpower policy.	No special appropriations.
Title VI Emergency Jobs Program	Passed in 1974 as an amendment to CETA. Like Title II, Title VI establishes public employment programs for unemployed individuals. Unlike Title II, Title VI was passed as an emergency measure to ease the impact of high national unemployment. Jobs subsidized under Title VI need not lead to unsubsidized employment.	No FY '76 appropriations. FY '75 appropriations for 2 years—$2,500.
Title VII	(Formerly Title VI) Sets forth the administrative requirements under the Act.	

Most of the supportive services available under Title I are the kinds of social services states could provide to their Title XX clients, e.g., child day care, transportation and employment counseling. Some CETA services—emergency cash assistance solely to enable a participant to enroll or continue in a CETA program—are not an allowable expense under Title XX. CETA Prime Sponsors may provide their own designated supportive services—family case work, for example—but whatever services are provided add to the cost-per-placement factor, a key performance measure under CETA. As is the case with most state Title XX programs, CETA Title I funds are generally committed and the amount available for supportive services severely limited.

Title III of CETA deserves special attention for some state Title XX programs in that it provides for grants involving specific target groups, e.g., migrant farm workers and Native Americans. Title III grants are administered by the national office of the Department of Labor and could be awarded to state and local social services agencies who serve these groups.

Titles II and VI offer salary compensation plus fringe benefits to public and private non-profit organizations who employ CETA participants. State and local CETA Prime Sponsors determine what kinds of training and supportive services CETA clients can receive and how many job "slots" will be allocated to which agency.

State or local social services agencies and their public and private purchase-of-service providers would likely qualify for CETA subcontracts from Prime Sponsors within their jurisdiction.

Grantee Eligibility

Cities and counties with populations over 100,000 are eligible to apply for CETA Title I Funds. Grant amounts are determined in advance by formula. In some instances an eligible city or county may combine with other eligible jurisdictions, or with jurisdictions not themselves eligible, to apply for funding as a consortium. This is encouraged by the Act, which recognizes that many labor market areas consist of more than one political subdivision. States also apply for CETA Title I funds to serve all areas of the state not covered by city or county programs. The state program is generally referred to as the "Balance-of-State" program.

In the case of Title II programs, the same grantee eligibility requirements apply. In addition, however, the jurisdiction must contain an area or areas of "substantial unemployment" in order to qualify. Areas of substantial unemployment must have unemployment rates of at least 6.5 per cent for three consecutive months or more.

If an eligible applicant (Prime Sponsor) under Title II has separate units of government within its area which have populations of 50,000 or more and qualify as areas of "substantial unemployment", the Prime Sponsor must designate those governments as *program agents* and allow them to operate their own Title II programs. This occurs most frequently among state Prime Sponsors dealing with counties or cities within the Balance-of-State. Large counties may also have city program agents within their boundaries.

All Title I Prime Sponsors are eligible to receive Title VI funds. Prime Sponsors with areas of substantial unemployment receive additional allocations under Title VI.

Title III funds may be applied for by established Prime Sponsors, other state agencies, or by public or private organizations, and are funded directly by the Department of Labor. Frequently, Title III grantees are community-based organizations serving special target groups or delivering special services.

The formulae for allocating Titles I, II, and VI funds take into account such factors as proportionate number of unemployed, underemployed, and low-income persons compared with the total number of each in all eligible jurisdictions. The formula varies slightly depending on the Title.

CETA is a formula grant program that is 100% Federally-funded, whereas Title XX is a formula reimbursement program requiring a non-Federal match. (CETA funds cannot be used for matching Title XX.) CETA funding allocations fluctuate annually.

Who is Eligible to Receive CETA Services

Eligibility for participation in CETA funded programs is quite broad. The legislation stipulates only that an individual must be economically disadvantaged, unemployed, or underemployed.

Most Prime Sponsors provide services and activities only to individuals who reside within the Prime Sponsor's geographical program area. Residency is a requirement for public employment funded under CETA.

An "economically disadvantaged" individual is a member of a family receiving cash welfare payments or a member of a family which has a combined income of less than the poverty standard relative to family size as established by the Office of Management and Budget.

An "unemployed" individual for Title I activities (except welfare recipients) is without a job (did not work during the calendar week preceding the week in which determination of eligibility is made) and wants and is available for work.

An "underemployed" individual is working part-time and seeking full time work or working full time and receiving less than the poverty wage as established by the Office of Management and Budget.

The definition of "unemployed" varies slightly for Title II and Title VI purposes where the length of time since last employment is generally required to be at least thirty days. There are exceptions to this, however, so applicable regulations should be reviewed as they pertain to programs in any given area.

In addition to requirements established by law, some Prime Sponsors have developed more restrictive requirements for programs within their jurisdictions. For example, some Prime Sponsors have limited enrollment to the economically disadvantaged. Local policies governing CETA operations should be reviewed in each jurisdiction.

CETA and Title XX have overlapping client populations. The poverty guidelines established and periodically revised by the President's Office of Management and Budget differ from the median income levels published by the Department of Health, Education and Welfare for purposes of the Title XX program. CETA Prime Sponsors have the authority to develop more restrictive income levels, as is true with states, in the publication of their annual services plan.

CETA Prime Sponsors are encouraged but not required to serve welfare recipients. Welfare recipients may be deemed by the Prime Sponsor to be a group "most in need" of CETA services, but this designation may also apply to handicapped workers or other significant segments of the population. In considering welfare recipients as a significant segment, a CETA Prime Sponsor would only count AFDC and SSI recipients who are actively seeking employment. Urging a Prime Sponsor to coordinate with Title XX may serve to promote more recognition of welfare clients as a significant segment of the population.

Target Groups

Prime Sponsors must ensure that, within the broad eligibility requirements prescribed by law, "significant segments" of the population are served and that those "most in need of service" are given priority. Significant segments identified in the Act include veterans, economically disadvantaged, public assistance recipients and youth.

Additional significant segment groups (identified locally) might include:

—minorities

—persons of limited English speaking ability

—ex-offenders

—educationally disadvantaged

—Native Americans

—the handicapped

—older workers

—former manpower program enrollees.

Prime Sponsors are encouraged to serve significant segments in proportions consistent with their incidence in the labor force. However, no numerical quotas are established except that Title II contains a 30% goal for veterans' participation.

Employment and Training Under CETA

CETA authorizes broad and diverse activities and services in keeping with CETA's mandate to provide whatever an individual may require in order to obtain self-sufficient employment. Certain classifications of services and activities are listed in the Act.

However, they are not meant to restrict or constrain Prime Sponsors, but rather to create broad reporting categories for Prime Sponsor services and activities and funds expended for such services and activities.

Reporting classifications under Title I include classroom training, on-the-job training, public service employment, work experience, and other activities.

Classroom training is provided in an institutional setting, on an individual or group referral basis, and may provide specific occupational skills or upgrade basic skills. Individuals receiving classroom training under CETA receive a basic training allowance (minimum wage) and may receive dependent allowances where appropriate.

On-the-job-training (OJT) takes place in an actual work situation with a private or public employer. OJT is designed to provide specific occupational skills or to refine skills acquired in a formal training setting. Individuals receiving OJT are considered employees of the organization providing the training and receive wages comparable to other employees carrying out the same kind of work. CETA may reimburse the employer for training expenses in excess of those normally incurred while training a new employee. CETA may *not* reimburse a private-for-profit employer for wages.

Public service employment is designed to provide an individual with:

—a consistent work history in a particular occupation, and/or

—on-the-job training, and/or

—access to a public sector unsubsidized position.

Public service employment jobs are located in public or private non-profit organizations. CETA normally reimbourses the organizations for wages and benefits paid to CETA participants. Organizations may only receive public service employment funds for new positions not previously budgeted, and are encouraged to move at least 50% * of the CETA-subsidized individuals into regularly budgeted positions. CETA participants in public service employment receive wages and benefits identical to others doing similar work in the organization.

Currently the maximum CETA subsidy for any PSE job is $10,000 plus fringe benefits. Agencies employing CETA participants at a higher salary are allowed to finance the difference. The Prime Sponsor may set its own subsidy ceiling and may determine which, if any, public or private organizations will be eligible.

In setting its subsidy ceiling, the Prime Sponsor must do so within the constraints of the minimum wage and the prevailing rate for persons employed in similar positions by the same employer.

Cooperative planning between CETA and Title XX could lead to the provision of PSE positions in Title XX provider agencies. Title XX in turn could make supportive services available to CETA participants who qualify for such services under the state's Comprehensive Annual Services Program (CASP) plan.

Work experience is designed to provide short-term work assignments in public or private non-profit organizations in order to introduce participants to actual job environments or to build creditable work histories.

Participants receive wages equalling at least the minimum wage (state or Federal, whichever is higher).

CETA allows for greater flexibility in job training than Title XX. While Title XX could provide classroom training (if not regularly available free of charge at public educational institutions), these funds are not permitted to be used for training allowances or wages.

The emphasis or mix of activities in any Prime Sponsor program will be dependent on the policies and priorities set locally. There are no Federal requirements regarding the mix of activities or whether a particular activity is included at all. It should be noted, though, that Titles II and VI focus primarily on public service employment. Title II funds, however, may be spent on any activities authorized under Title I.

Manpower and Supportive Services Under CETA

In addition to the above activities, Prime Sponsors may provide manpower and supportive services to the extent necessary for an individual to achieve his or her career objective.

Manpower services, their purposes and uses include, but are not limited to:

—outreach

organized and utilized in time of low unemployment, low demand for training

an option for locating "significant segments" and most in need"

—intake

eligibility determination certified after interview and verification

—assessment

to determine what CETA services are needed

usually limited to 2 - 3 weeks

—individual service plan

detailed employability development plan (Prime Sponsor option)

—counseling

emphasis on realistic choice given training availability and labor market conditions

vocational counseling often primary focus

—job development

emphasis on both mass job order solicitation and individual job development.

Supportive services include but are not limited to:

– child day care

—health care and medical services

—emergency aid

—residential support

—assistance in securing bonds

—family planning on a voluntary basis

—legal services,

—transportation.

* Note: Prime Sponsors are free (and many take advantage of the opportunity) to formulate more restrictive placement goals than those in the Act and regulations. Prime Sponsors, for example, may increase this percentage as high as 100%. Prime Sponsors may also request a waiver of the existing placement goal and negotiate a figure lower than 50%.

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In addition, post-placement services, including any of the above, may be provided to CETA participants for 30 days following placement on a job.

While there is generally no ceiling on costs allowable in the provision of services to an individual, Prime Sponsors are urged to keep total expenditures per client and costs per placement within "reasonable" limits. Moreover, there is no time limit on enrollment, but the legislation limits the payment of training allowances to a maximum of 104 weeks. An individual could continue to be enrolled and participate in the program after 104 weeks although he would no longer be eligible to receive allowances.

Many state Title XX programs include "manpower" services similar to CETA. The first two CETA manpower services listed above are intended to get individuals to participate in CETA. Social services agencies provide an obvious source for recruitment. CETA "counseling" is not necessarily restricted to vocational needs. Prime Sponsors can make available social work counseling to CETA participants and their families.

Post-placement services refer to services provided to CETA participants who are placed in unsubsidized employment. These services are limited to thirty days, which could jeopardize an individual who needs subsidized supportive services, e.g., child day care, to continue employment. It may be beneficial to both CETA and Title XX to develop coordination linkages for services to CETA participants placed in low-income positions. Key factors involved would be the Title XX income status eligibility criteria for services set by the state and the availability of Title XX service funds. By continuing post-placement services, a Title XX agency may avoid the possibility that the worker drops out and becomes a welfare recipient, representing a greater cost to the agency and taxpayer.

Delivery of Services

Prime Sponsors may elect to provide services directly to participants or to deliver such services through subcontracts with other agencies or organizations in the community. This choice depends upon whether it is economical to develop the capacity to deliver some services themselves as opposed to utilizing existing community resources. In addition, Prime Sponsors must consider the quality of existing services versus the quality of services they might develop themselves.

Services frequently subcontracted include:

—classroom training

—health care

—child care

—some job development and placement

—outreach.

Services typically provided by CETA staff include:

—intake and assessment

—orientation

—counseling

—administration of OJT

—portions of job development.

The actual degree of in-house delivery versus subcontracting may vary dramatically from Prime Sponsor to Prime Sponsor.

Title XX service delivery possibilities vary similarly to CETA. Some CETA subcontractors may also have Title XX services contracts with the state or local social services agency. A local Community Action agency, for example, may provide CETA training and Title XX child care.

Key Performance Measures and Reporting Requirements

The primary measure of Prime Sponsor success is their ability to meet the goals and objectives as stated in their Comprehensive Manpower Plan. One of the most important "planned vs actual" measures is effectiveness in "placement", moving program participants into unsubsidized employment at wage levels providing self-sufficiency. With this, though, placement *duration* is reported as:

—short term (0-3 days)

—medium term (3-150 days)

—long term (greater than 150 days).

Secondary performance categories include:

—effectiveness in committing CETA resources within the Prime Sponsor's program area (speed of implementation and full expenditure within the grant period)

—cost per participant

—cost per placement

—service to the "most in need" (focusing on disadvantaged)

—service to identified "significant segments" and veterans.

During the initial year of CETA activity, Prime Sponsors were concerned with committing CETA funds rapidly. As program operations continue, however, and as more programs begin operating near capacity, the issues of placement and service to "significant segments" will probably dominate performance reviews.

The maintenance of individual client records is generally common practice in both CETA and Title XX. Prime Sponsors have the option to develop a detailed employability services plan for every CETA participant. State Title XX agencies must maintain Individual Recipient Data Base Files. The main performance measure under Title XX is the accounting for service expenditures to individual client categories. For CETA, it is the highest number of placements in unsubsidized employment for the lowest cost per placement.

These key performance measures are closely tied into the reporting requirements for CETA. Each CETA Prime Sponsor must submit statistical and financial information to the Department of Labor. The focus of this reporting is on:

—enrollment of CETA clients by individual client characteristics and distribution of clients throughout CETA activities

—successful job completions

—other terminations

—expenditures (planned vs. actual).

CETA reporting requirements are in many ways similar to the procedures specified by HEW's Social Services Reporting Requirements. The following chart provides some broad comparisons between the programs' reporting procedures.

TITLE XX	CETA
Client Characteristics —must report goal and service provision status of client groups categorized as: AFDC SSI Aged Blind Disabled Income Eligibles Medicaid Eligible (Title XIX) AFDC/WIN (Title IV)	—must report enrollment status of participants characterized by: Age Sex Education Income
Services/Activities —must report number of recipients provided each service by: client category method of service delivery direct provision purchased from public agencies purchased from private sector —goal: must determine whether client goals are achieved or not, terminated and/or transferred to another goal	—must report number of participants by each activity (planned vs. actual figures): served to date currently enrolled —must report number of successful completions, i.e., number of participants placed in permanent jobs without subsidy (planned vs actual): short term medium term long term —must report other terminations: neutral terminations (e.g., pregnancy, attending school, etc.) negative terminations (e.g., drop out prior to completion of Employability Development Plan)
Financial Reporting —states are required to report actual service costs against services and costs estimated in their Comprehensive Annual Services Program Plan	

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Role of the CETA Lead Agency

The Chief Elected Official, as recipient of CETA grant funds, must designate a lead agency or organization within the jurisdiction to operate the CETA program. Lead agency responsibilities include preparation of the grant application and comprehensive manpower plan, development and operation of administrative systems, delivery of activities and services, and development and administration of subcontracts for services.

The state agency designated by the Governor is usually a:

—Governor's Office of Manpower,

—State Employment Security Agency,

—State Office of Planning and Programming,

—State Office of Community Affairs,

—Office of the Labor Commissioner,

—a Comprehensive Human Resources Agency.

The County level lead agency would most likely be a:

—Supervisors' Office of Manpower,

—County Human Resources Agency,

—County Personnel Department.

The Mayor is most likely to designate a:

—Manpower Office,

—Department of Human Resources,

—Department of Personnel (smaller Prime Sponsors).

In a multi-jurisdictional consortium, a separate entity is likely to have been designated or created specifically to operate CETA on behalf of all consortium members. It would be funded by all the involved jurisdictions.

CETA Comprehensive Manpower Plan

Prime Sponsors must submit with their annual application for funding a comprehensive manpower plan that states, for each Title, how they intend to use their CETA funds and how they intend to coordinate CETA activities with other manpower programs and services operating in the area. The plan generally consists of a narrative description of the program; a program planning summary (numbers of people, significant segments, services and activities planned); a budget information summary; and a labor market summary.

Generally, the comprehensive manpower plan sets forth:

(1) the Prime Sponsor's policy with respect to purposes of the program,

(2) a description of the economic conditions and the labor force characteristics in the area,

(3) identification of shortage occupations,

(4) a definition of the area manpower needs,

(5) the groups to be served, and

(6) the goals (quantitative results expected) of the program.

In addition, the plan states how the planned activities serve identified manpower needs, the reasons for selecting the various activities, and how all activities and services will lead CETA participants to economic self-sufficiency. Finally, plans must include a description of how the program will be organized, how each service included in the plan will be operated, how significant segments and veterans will be adequately served, how the financial and administrative systems will be designed, and how CETA will be coordinated with other manpower services in the area.

The CETA Prime Sponsor comprehensive manpower plan is submitted annually, usually in April or May, but prior to the start of the new fiscal year. Prime Sponsor planning staffs generally initiate accelerated planning activities early in the calendar year in order to meet the spring deadline. (This timing will change with the new Federal fiscal year.)

Title XX requires the development of a Comprehensive Annual Services Program (CASP) plan similar to that required by CETA. The state can choose either the state or Federal fiscal year to operate its Title XX program. For states that have chosen the Federal fiscal year, the timing of their Title XX planning activities should correspond to the timing used for CETA.

The planning processes for CETA and Title XX have some similarities. Thirty days prior to plan submission Prime Sponsors must announce in newspapers of widest circulation (including non-English newspapers) the basic content of their Comprehensive Manpower Plan. A public comment period follows. Changes in the plan, if needed, are made, and when the CETA program year starts, another announcement is placed in the newspapers.

Advisory Groups and Plan Review

The CETA legislation requires that as part of the planning process each Prime Sponsor establish a Manpower Planning Council to review and make recommendations on the Prime Sponsor plan. In addition, each state must establish a State Manpower Services Council (SMSC) to (1) review the plans of all Prime Sponsors in the state, and (2) to make recommendations concerning the provision and coordination of manpower services among Prime Sponsors and manpower-related state agencies.

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The Prime Sponsor Manpower Planning Council should be composed of members representing:

—the participant community

—community-based organizations

—the State Employment Service

—education and training agencies and institutions

—business and organized labor

—agriculture where appropriate.

Specifically, the Planning Council advises the Prime Sponsor on setting basic goals, policies, and procedures. In addition, the Council must monitor all activities funded under the Act and provide objective evaluations of other manpower and related programs operating in the Prime Sponsor's area in order to improve the utilization and coordination of such services.

The State Prime Sponsor, in addition to its Prime Sponsor Planning Council for Balance-of-State operations, must establish the State Manpower Services Council, which serves all Prime Sponsors in the state.

The SMSC consists of:

—at least one-third representatives of Prime Sponsors (required)

—one representative each from:

the State Vocational Education Board (required)

the State Employment Service (required)

any other state agency the Governor believes has an interest in manpower or manpower-related services

—representatives are also suggested from:

organized labor

business

the general public

community based organizations

client populations.

In its advisory capacity the SMSC must review all Prime Sponsor plans within the state and all state agency plans for providing services to Prime Sponsors within the state. Reviews are conducted for the purpose of recommending ways to improve coordination between Prime Sponsors and state agencies in the delivery of services. In addition to plan review, the SMSC is charged with monitoring the availability, responsiveness and adequacy of state services provided by all manpower-related agencies, to assure that effective coordination is taking place.

The SMSC affords a state Title XX decision-maker access to CETA program information and planning statewide. Consideration should be given to getting a Title XX representative appointed to the SMSC, if the Governor has not already made the appointment.

Title XX administrators should also consider requesting appointment to state and local manpower planning councils to further influence CETA plan coordination with their social services program. Advisory councils are not required under Title XX. Many states, nevertheless, have advisory groups and task forces to review their services plan development. State and local CETA representatives might be considered for appointment on these Title XX boards.

Special Responsibilities of State Prime Sponsors

The State Prime Sponsor, in addition to operating the Balance-of-State program, has certain additional responsibilities for statewide manpower activities. Each state receives a special grant for the provision of statewide manpower services and staffing the SMSC.

Special manpower services may include:

—services under the Act throughout the state by state agencies responsible for employment, training, and related services;

—financial assistance for special programs and services designed to meet the needs of rural areas outside major labor market areas;

—developing and publishing information regarding economic, industrial, and labor market conditions;

—technical assistance, without reimbursement and upon request, to any Prime Sponsor serving an area within the state;

—special model training and employment programs and related services, including programs for offenders and similar programs.

State CETA and Title XX programs could establish interagency program linkages. Title XX allows for the purchase of services from other state agencies. State CETA programs subcontract for services from other state agencies, e.g., state Departments of Vocational Rehabilitation. Non-financial agreements also exist between state CETA programs and other state agencies for the exchange of data and client information.

Special Vocational Education Funds
The Governor of each state receives a special grant to provide vocational education services to Prime Sponsors within the state. These special grant monies must be channeled through the State Board of Vocational Education and may only be used for the provision of vocational education services to each Prime Sponsor.

Each Prime Sponsor negotiates a non-financial agreement with the State Board of Vocational Education, which specifies the kind of services to be provided and the manner in which services will be provided. Services under the special grant/non-financial agreement are in addition to any educational services which the individual Prime Sponsors may purchase with regular Title I funds.

Mandate for Coordination
Congress, in deliberating the CETA legislation, expressed a strong desire that CETA activities be coordinated effectively with other manpower and manpower-related activities in each Prime Sponsor jurisdiction. Section 106 (b)(2), (3), and (7) requires that each Prime Sponsor, to the extent feasible, must establish cooperative relationships or linkages with other manpower and manpower-related agencies in the area. In addition, any Prime Sponsor intending to provide service to recipients of Aid to Families with Dependent Children (AFDC) should coordinate with the local sponsor of the Work Incentive Program (WIN).

Beyond these direct charges to establish program coordination the states, through the SMSC and special grant funds, are responsible for encouraging and facilitating coordination among CETA Prime Sponsors and other state agencies providing manpower and manpower-related services.

State and local Title XX agencies could provide certain "manpower" services in the same context as CETA. These agencies are most likely however, to provide "manpower-related" services such as child care, transportation, medical exams, and other social services, to enable their clients to participate in employment and training programs. Title XX makes reference to the coordination of the state social services program with other related human service programs, e.g., employment and manpower. Title XX makes specific reference to the Work Incentive Program (WIN) but not to CETA.

Chapter Three
Some Specific Opportunities

Several specific coordination ideas are set forth in this chapter. No attempt is made here to present an exhaustive list of coordination ideas, nor should the list be construed as fully representative of the range of common denominators cutting across Title XX and CETA programs. Instead, the following may be more fairly characterized as among the most obvious coordination opportunities.

The opportunities presented in this chapter are drawn as much as possible from actual experience in various parts of the country. The opportunities were supplemented by examples developed by analysts experienced in both Title XX and CETA administration, programming and operations.

Certain opportunities presented are project-oriented. It must be assumed that any Title XX service described within a "project" is one that would be generally available to specific client categories within each particular geographic area as defined in the state's annual services plan. Such a service could not be restricted only to CETA participants who are also eligible for Title XX.

The reader may find that some examples do not presently fit his or her program because Title XX, perhaps more than CETA, is designed by the state, thus having unique services and client categories in each state. The opportunities presented can, nonetheless, be modified to fit the unique aspects of virtually any state Title XX program.

The purpose of this chapter is to initiate or nurture, in as many jurisdictions as possible, the analytic process by which Title XX administrators and staff can identify potential relationships with CETA programs, which in turn will benefit Title XX, CETA, and their common clients.

Each of the opportunities is organized into eight parts as follows:

A. The Issues Facing Title XX and CETA

B. How Coordination Can Help

C. How It Might Work

D. How Title XX Can Benefit

E. How CETA Can Benefit

F. Risks to Title XX

G. Risks to CETA

H. How to Reduce the Risks.

Opportunity 1: Child Day Care Services

Issues Facing Title XX and CETA
Child care may be the single most important supportive service to certain Title XX and CETA clients. AFDC recipients, particularly single women with young children, are often unable to enter training programs or to get jobs because adequate child care services are not readily available. The costs of child care services hamper CETA's performance record due to the expanded cost-per-placement. States generally offer child care as a service to their Title XX clients, but face a financial problem compounded by the high staff-to-child ratios that Title XX child care facilities are required to meet.

How Coordination Can Help
A common goal of Title XX and CETA is to enable their clients to obtain self-supporting jobs. Title XX recipients, particularly AFDC single parents who want jobs, can offer CETA a source of motivated trainees and possibly experienced job-ready participants. The cost-per-placement of such participants could be lessened if CETA and Title XX share the costs of child care services. State and local Title XX agencies have extensive experience with child care services that CETA Prime Sponsors often lack and might offer a resource for financing child care services to CETA participants placed in jobs. By virtue of its ability to subsidize training and employment, CETA has better access to the job market than Title XX. Once Title XX clients are in jobs, it is more likely that they will become self-sustaining, even to the point that subsidized services such as child care are no longer needed.

How It Might Work
The CETA Prime Sponsor can negotiate a financial agreement with the Title XX agency for the information, referral and placement of CETA participants' children in child care. The agreement can specify that CETA will pay for a particular number of child care "slots" while Title XX will make available an additional number of "slots" to CETA participants who are eligible for Title XX services. The agreement can include a provision that CETA will give special consideration for training and jobs to clients that the Title XX agency refers to CETA. In the financial agreement the Title XX agency can take responsibility for the administration of child care services. It can provide child care counseling and referral to CETA parents. It can contract with the child care providers that the parent wishes to use if the provider meets established child care standards. The Title XX agency can agree to inspect and monitor the provider's facility and program on an ongoing basis.

An optional non-financial agreement can be developed regarding child care career training in Title XX-financed facilities. CETA can agree to place trainees in Title XX child care facilities. The wages paid to trainees through CETA could partially offset the operational costs involved in meeting the high staff to child ratios required by Title XX. The lower operational costs could reduce the proportionate amount the Title XX agency currently pays for child care services. The non-financial agreement assumes that child care careers offer the opportunity for self-sustaining employment either within the facility or in the community.

How Title XX Can Benefit
—The Title XX agency has access to CETA's capability to place AFDC single parents who want to enter the job market.

—The Title XX agency has another source of funding for child care that is more flexible than Title XX funds since CETA has no matching requirement and is not covered under the Federal Interagency Day Care Requirements.

—The Title XX child care provider can reduce its operational costs by using CETA trainees.

How CETA Can Benefit
—CETA has an experienced resource in administering child care services.

—CETA has access to Title XX's capability to finance a portion of the child care services costs which could help reduce the cost-per-placement.

—CETA has access to Title XX's capability to subsidize child care to CETA participants after they are placed in jobs (provided that their income level does not exceed the state's maximum income level to be eligible for Title XX child care).

Risks to Title XX
—That the agency lacks the staff needed to administer the CETA child care agreement effectively.

—That by holding open Title XX child care "slots" for CETA, other eligible Title XX clients would not be served and Federal matching monies might be lost.

—That CETA will not focus on the employment needs of Title XX clients.

Risks to CETA
—That contracting for services with the Title XX agency will not reduce the cost-per-placement figure.

—That the Title XX agency will not adequately service CETA participants due to their other child care service responsibilities.

—That child care careers in the community do not provide adequate salaries for self-sustaining jobs.

—That CETA participants in jobs would become ineligible for Title XX child care services.

How to Reduce the Risks
—Determine whether it is cost-beneficial for CETA and Title XX to enter into a purchase-of-service agreement for child care.

—Agree to the financial and programmatic responsibilities of each agency for child care and employment services.

—Secure adequate matching funds for Title XX child care services and determine whether the maximum income level for Title XX eligibility is adequate for sustaining clients in jobs.

—Negotiate the number of child care "slots" available to mutual CETA and Title XX clients and procedures regarding which agency will pay for the services.

—Develop procedures for the training and placement of child care workers in Title XX facilities to ensure program continuity and adequate career advancement.

—Agree on what accounts, records and reports are required for each program, and develop joint reporting procedures to reduce administrative time and costs.

—Develop a realistic timetable for program implementation.

Opportunity 2: Social Service Paraprofessional Training and Employment

Issues Facing Title XX and CETA
Many state Title XX agencies will be making maximum use of their annual Federal allotments and will not be able to expand services further without other resources. Provided that sufficient matching funds are available, a state Title XX agency can acquire additional Federal dollars in excess of its annual allotment for the purpose of training its direct service workers and supervised volunteers. To increase services, however, the agency must look for other funding sources to pay additional staff salaries. CETA Prime Sponsors are seeking meaningful public service employment positions to subsidize with Title II and VI funds. Prime Sponsors need to use existing resources, such as Title XX, to supply supportive services to their clients and still maintain a low cost-per-placement ratio.

How Coordination Can Help
Excluding those tasks that require professionally trained social workers to handle, e.g., placing dependent children in foster homes, there are many service tasks that could be performed by paraprofessional workers under the supervision of trained specialists. Examples of the kind of social service positions paraprofessional workers could fill are:

—Transportation Aide

—Family Planning Counselor

—Child-Parent Educator

—Convalescent Counselor

—Paralegal Aide

—Information and Referral Worker

—Bilingual Community Outreach Worker.

The list is hardly exhaustive. Many of these services are presently being provided through state Title XX programs. In many instances these services involve routine non-technical tasks currently handled by trained social workers. Since often social workers are burdened with heavy case loads that require their specialized knowledge, it would be beneficial to them and their clients to allow paraprofessional workers to perform services not requiring a specialist's direct attention. CETA could provide public service employee positions for paraprofessionals who could work under the supervision of these specialists. Title XX funds could be used for classroom training to supplement this on-the-job supervision.

As the CETA-subsidized paraprofessionals get training and work experience, they could be eligible for permanent social service employee positions that open up due to attrition or program expansion in later years.

How It Might Work
The Title XX agency could examine the job specifications of the kinds of services it makes available in order to determine the extent to which paraprofessionals could be used. The CETA Prime Sponsor could arrange either to provide the Title XX agency with public service employment (PSE) slots paid for through Titles II or VI, or to provide the Title XX agency with CETA trainees. The CETA enrollees would be employees of the Title XX agency under its merit system, supervision and control. A joint interagency agreement could stipulate that the paraprofessional training and supervision would be the responsibility of the Title XX agency. In addition to assigning of supervisors to guide these paraprofessional workers and CETA trainees, the Title XX agency could contract with a post-secondary educational institution to provide them with classroom instruction specifically related to service delivery.

How Title XX Can Benefit
—Title XX services will be expanded with Federal funds beyond the ceiling on Federal reimbursement.

—With the help of paraprofessional workers the Title XX agency will have a better understanding of its clients' felt needs.

—The client community will feel that the Title XX agency is more approachable and understanding of their needs.

—The Title XX agency will have developed an expanded source of service workers.

How CETA Can Benefit
—CETA can help to develop a new market for employment eventually leading to non-subsidized positions.

—More supportive services can be made available to CETA clients.

Risks to Title XX
—That the Title XX agency will be spending more on overhead and supplies for the new CETA subsidized positions than anticipated.

—That the use of Title XX training funds with CETA funds for salaries could be possible grounds for a later audit exception.

Risks to CETA
—That CETA clients will not be given the opportunity to advance into regularly paid positions in the Title XX agency.

—That the Title XX agency will not provide the CETA employees adequate on-the-job training and outside classroom instruction.

—That CETA and Title XX will be training paraprofessionals for positions that will not be sustained without subsidy.

How to Reduce the Risks
—Develop a joint agreement that the Title XX agency will examine its organizational structure for service delivery and develop, with CETA assistance, job descriptions for new paraprofessional positions.

—Agree that each agency will examine its finances and develop realistic budgets for the joint project that take into account the expenses of salaries, equipment and supplies, on-the-job supervision, and classroom instruction.

—Agree to explore what post-secondary careers are available or could be developed to train the paraprofessional workers, including how much training could lead to the acceptance of professional credentials.

—Agree to develop a system for potential career advancement for paraprofessional workers.

—Negotiate an agreement between the CETA Prime Sponsor and Title XX agency that includes joint career development responsibilities for the paraprofessional workers and the provision of classroom instruction.

—Maintain accounts that track Title XX training expenses directly to each CETA subsidized position to avoid audit problems.

Opportunity 3: A Co-Located CETA/ Social Services Support Unit

Issues Facing Title XX and CETA
One of the five national goals of Title XX is self-support for clients. State social services programs are required to provide at least one self-support service in each geographic area of the state. In response to this requirement states can make available a variety of self-support services, such as:

—employment

—education and training

—health services

—legal services

—money management services

—housing services

—day care

—transportation.

(Not all of these services are offered in every state.) CETA Prime Sponsors provide many similar services to the same client population as Title XX. The extensive use of CETA resources for supportive services increases "cost-per-placement", a key performance measure for the Prime Sponsor.

How Coordination Can Help
With the development of a joint CETA/ Title XX supportive services unit mutual clients would have better access to a greater mix of services. Title XX could finance many support services, up to the point that a client is placed in employment. If the Title XX client then becomes ineligible for certain social services due to his increased income status, CETA could still maintain certain needed supportive services for at least 30 days after the client becomes employed.

How It Might Work
The Title XX agency and CETA Prime Sponsor can explore the use of a common facility for intake and counseling which might be located in a neighborhood with large numbers of unemployed persons and/or welfare recipients. A possible staffing pattern for the facility could include AFDC eligibility workers, a Title XX family counselor, a CETA vocational counselor, and a Title XX social services resources coordinator.

The service facility could be donated by a public agency or by a private entity, e.g., a neighborhood school, church or recreational center. Management of the services units could be performed by a joint CETA/ Title XX appointed director. The CETA and Title XX staff could operate as a team, utilizing common intake of clients and joint case management techniques for clients needing multiple services. Before the services unit became operational, staff training sessions could be undertaken to assure that each team member understood his role, responsibilities, and relationship with the other staff members. Likewise, the CETA Prime Sponsor and Title XX agency could develop procedures for communication with and accountability for the co-located support unit personnel as specified in a formal interagency agreement.

How Title XX Can Benefit
—Integrated staff increases Title XX clients' access to CETA.

—Staffing costs are less than if the center was funded entirely by Title XX.

—Combined staff makes service delivery in inner city neighborhoods and less populated rural areas economically feasible.

How CETA Can Benefit
—CETA can lower its "cost-per-placement" by having the Title XX agency provide many CETA supportive services.

—CETA clients eligible for Title XX services are given greater access to those services in co-located CETA/ Title XX facilities.

Risks to Title XX
—That competent professional staff may not want to work in rural or inner-city areas.

—That CETA staff will have different work priorities than Title XX staff, making integrated services under a single manager unworkable.

Risks to CETA
—None apparent.

How to Reduce the Risks
—Agree on what services will be made available to common clients and assure those clients first priority in receiving services.

—Agree that the center manager will have authority to supervise the joint Title XX/CETA staff, while agreeing that program authority will be retained by the respective agencies.

—Agree to grant service workers special incentives, e.g., special stipends for education and conferences, special recognition leading to job promotion, etc., for working in a rural or inner-city facility.

—Agree to keep central office middle-management and program specialists fully informed of the integrated service unit concept; this action would help avoid the risk that Title XX and CETA central office staff might countermand the service center manager's instructions to his staff.

—Agree on what reports the center manager and his staff are required to provide the Title XX agency and CETA Prime Sponsor before center operations begin.

Opportunity 4: Youth Employment Program for Marginal School Attendees and Dropouts

Issues Facing Title XX and CETA
In some communities, particularly inner-city areas, there exists a large population of unemployed youth. Many of these youth are school dropouts or youth who attend school only sporadically. Counseling and work experience are needed to make their education more relevant and attractive for job pursuits. The effectiveness of Title XX youth counseling is hampered by not having sufficient outlets of meaningful work experience for young people so they may gain self-confidence at work and a positive self-image at school. Many CETA Prime Sponsors would like to expand their youth employment programs but find the associated costs of youth counseling to be too expensive.

How Coordination Can Help
In some states private youth service agencies provide youth counseling and recreational services programs that are funded through Title XX purchase of service contracts. These agencies have joint projects with high schools to keep teenagers in school and to serve dropouts. What many of these youth lack are jobs that would give them the incentive to continue their education. Youth services agencies have no resources to subsidize meaningful jobs for youth that relate to their counseling program or to high school education. CETA can provide these resources.

How It Might Work
Often, a neighborhood-based youth services organization (e.g., a community mental health center) is best equipped to reach out and enroll young people into counseling and work experience. The Title XX agency can purchase youth counseling services from that type of organization while the CETA Prime Sponsor can subcontract with the youth services organization for work experience. The youth services organization can help teenagers get jobs in public agencies or private nonprofit organizations and can subcontract with these employers to provide CETA-subsidized work experience for youth. The youth counseling and work experience program can operate year-round.

Either an informal arrangement or a non-financial agreement can be established among the Title XX agency, CETA Prime Sponsor, youth services organizations, and the neighborhood high school. This could assure proper interagency communications in targeting services to individual school dropouts and sporadic attendees.

How Title XX Can Benefit
—Title XX's record in counseling youth to undertake work experience and to complete their education would be improved.

—Title XX eligible youth who have completed their high school and work experience programs would have a greater chance to obtain permanent employment.

How CETA Can Benefit
—Support services to youth (e.g., counseling, sheltered workshops, job recruitment) are high cost items for CETA; Title XX can relieve CETA of these costs so it can concentrate resources on employment for youth.

—CETA could be serving a significant segment (youth) as well as serving AFDC recipients, assuming that this latter category is designated by the Prime Sponsor to be "most in need."

Risks to Title XX
—That CETA would set limitations on its work experience funds to focus on summer rather than full-year youth employment.

—That the CETA Prime Sponsor would limit work experience funding to certain types of employment (e.g., in public agencies only) and thereby exclude many work sites where youth would feel comfortable working (private non-profit recreational centers, etc.).

Risks to CETA
—That more CETA monies would be allocated for youth than for other significant segments, causing an imbalance toward youth to the detriment of other unemployed persons.

—That there would not be a significant number of positive terminations, i.e., placement of youth in on-going unsubsidized jobs.

How to Reduce the Risks
—Convene the administrators of all programs involved in the project, (CETA, Title XX, the youth service provider and the high school) and involve them in all planning phases of the project from the start.

—Agree to what counseling services are to be provided and determine how these relate to the individual youth's family, school, and work site.

—Survey work sites and agree where CETA funds can be used.

—Develop a committee whose members include representatives of Title XX, CETA, the youth services unit, and the school for the purpose of maintaining interagency communications.

Opportunity 5: Comprehensive Employment and Family Services

Issues Facing Title XX and CETA
Family and personal problems are often a cause of poor job performance or inability to obtain and hold a job. Many Title XX clients with family and personal problems need to be assured that they can be successfully trained and employed while family problems are being resolved. Because CETA often lacks resources to handle such problems Prime Sponsors exclude many applicants with personal problems who nonetheless possess a high skill and capability potential.

How Coordination Can Help
Title XX agencies are oriented toward helping clients to resolve family and personal problems that may impede the ability to become self-supporting. CETA's program focus is toward employment, getting a person trained and employed. If CETA/Title XX services were combined to meet the needs of mutual clients, both programs would gain a wider range of services which could lead to a higher degree of success.

How It Might Work
The local administrators of the CETA and Title XX programs can agree to supply each other with lists of the kinds of services they both offer to mutually eligible clients and how such services are provided. CETA and Title XX can agree to make services available to mutual clients on a functional basis: Title XX might supply family case work and social services, while CETA might supply manpower training and employment services. CETA and Title XX would agree on client eligibility standards for persons who want comprehensive employment and family services. The individual programs would perform a case assessment on each client and jointly decide, in consultation with the client, what service plan is appropriate. The individual service plan would offer assurances to the client that he or she will continue to receive services while in training and after the client is placed in a job. The case would be terminated when the client can sustain adequate employment and no longer needs specialized services, e.g., family counseling or substance abuse therapy. If the client's salary makes him ineligible for needed services under CETA or Title XX, the Title XX agency can use its information and referral capability to secure other community resources.

How Title XX Can Benefit
—More Title XX clients would obtain the means to become self-supporting.

—Title XX programs would be able to offer employment and training services to many of their clients.

How CETA Can Benefit
—CETA could enroll and more successfully serve a type of client previously considered too risky to include in the program.

—CETA could be serving more clients who fit the "most-in-need" category and who represent significant segments of the disadvantaged population.

—CETA could gain the capacity to see manpower services from a broader perspective that includes an individual's family life.

Risks to Title XX
—That CETA would improperly assess a mutual client's capacity to succeed in training and exhibit an unwillingness to continue services to clients who face extensive family and personal problems.

—That the services CETA provides are too short in duration to enable a mutual client to gain sufficient self-confidence to cope with both his family and employment environments.

—That client record confidentiality would not be safeguarded.

Risks to CETA
—That Title XX would fail to help an individual client to resolve his family or personal problems, thus jeopardizing the client's ability to continue training without disruption.

—That a client's poor performance would lower an employer's confidence in CETA's ability to supply reliable trainees.

—That at the completion of CETA's subsidy for training and employment, a client will drop out of employment because Title XX will withdraw needed support services, e.g., family counseling, making employment less palatable than welfare.

How to Reduce the Risks
—Agree what services will be available to mutual clients from each agency and at which point such services will be offered or withdrawn.

—Agree to develop a joint services plan in consultation with the client so that both agencies and the client know what services will be offered when and for how long.

—Agree that CETA will work with the Title XX caseworker and client to specify what performance will be required of the client in training and what options will be available to him or her when family crises arise that disrupt this training.

—Agree as to how client records are to be safeguarded.

—Agree that CETA will mediate employer dissatisfaction with a particular client if poor job performance arises from time to time.

—Agree that the CETA counselor and Title XX caseworker will meet regularly together and with the client to discuss a client's progress in the joint program.

—Agree to assure the client that needed services will not be cut off and that all records and services provided will be kept confidential so as not to jeopardize his relationship with his employer.

Opportunity 6: Joint Title XX/CETA Staff Training Workshops to Establish Effective Interprogram Communication

Issues Facing Title XX and CETA
Even though Title XX and CETA often provide similar services and have common clients in the same community, there appears to exist little communication between their programs. Inconsistent contact between staffs at the planning, administrative and operational levels leads to duplication of effort, e.g., more services in a particular area than needed, or a lack of information about resources available to clients from other sources.

How Coordination Might Help
Coordination can be most effective when there exists consistent levels of communication among program counterparts: Title XX planners with CETA planners; Title XX administrators with CETA directors; Title XX program providers with CETA sub-contractors. Good interprogram communication among planners, for example, might help avoid a common error of having two programs train people to fill the same job openings. At the administrative level, there exists a need for Title XX and CETA administrators to instruct and encourage their respective provider agencies to coordinate their services. At the operational level good interprogram communication can assure the effective exchange of information about each other's resources and the adequate referral of clients to use these resources.

How It Might Work
An agreement can be reached between Title XX and CETA administrators in each jurisdiction to conduct regular joint staff training workshops for program counterparts. The agreement should specify which groups are to be trained, where and when, and who will be responsible for developing training materials. It should also include how joint program communications might be established, e.g., through formal memoranda, informal telephone contacts, regular joint administrative or planning staff meetings, etc. The staff training costs would be shared by both agencies.

How Title XX Can Benefit
—Title XX planners can acquire new data and information for needs assessment.

—Title XX administrators can better establish priorities for the provision of services to clients knowing that they can receive certain services from CETA rather than through the social services program.

—Title XX service providers can have better access to CETA services, making client referral more practical.

How CETA Can Benefit
—CETA Prime Sponsors can have better access to persons most familiar with "most-in-need" clients and the services they need.

—CETA staff can refer their clients to particular Title XX service workers who are cross-trained rather than making general referral to the Title XX agency.

Risks to Title XX
—That the CETA Prime Sponsor would reduce the number of training sessions once they start because too much CETA staff time is being consumed in other types of training activities.

—That CETA/Title XX training would add to the administrative costs of Title XX.

Risks to CETA
—That the Title XX staff is considerably larger than CETA's, meaning that many Title XX staff will not be included in training and thus remain poorly informed about CETA.

—That CETA cannot afford the staff time and administrative costs for training.

How to Reduce the Risks
—Examine joint staff training needs for each program.

—Determine the time and expense of conducting training sessions.

—Agree on what training is to be provided, to whom, and by whom.

—Develop a realistic training schedule, taking into account the need to maintain flexibility, should one or the other program have an emergency need or crisis.

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Opportunity 7: Needs Assessment

Issues Facing Title XX and CETA
In developing its annual services plan, every state Title XX agency must undertake an assessment of the needs for services it plans to make available. Needs assessment must take into account all residents in all geographic areas in the state. The Title XX agency must describe how the needs assessment was undertaken, including the data sources used and the public and private organizations consulted, and must further describe the manner in which the needs assessment influences the annual service plan development. Every CETA Prime Sponsor must specify in its comprehensive manpower plans what significant segments of the population (e.g., aged, youth, veterans) are to be served in its programs and must maintain records to determine the extent to which the CETA program has met the special needs of those groups.

How Coordination Can Help
In many instances, the Title XX agency and each CETA Prime Sponsor must obtain identical statistical information for needs assessment, e.g., the number of persons on public assistance, location of poverty areas, economic outlook and projected demand for services. These agencies often approach the same data sources, e.g., the U.S. Census Bureau, social planning agencies, Social Security Administration, and state employment offices. They consult with the same private agencies, such as United Way, Urban League, and community action agencies. Coordination could lead to a more systematic approach to needs assessment that would enable both the Title XX Agency and the CETA Prime Sponsor to collect and use current data for reassessing each program's service priorities.

How It Might Work
In conducting its needs assessment both agencies must develop the means to collect timely statistical information that will give a proper profile of community needs. Where Title XX and CETA share common service jurisdictions both agencies might contract with a regional planning agency, e.g., Council of Government, for needs assessment. Another option is to perform the study in-house using joint staff.

First, the staff must collect statistical data giving social indicators of need, e.g., number of unemployed, number of AFDC single female heads of household with dependent children, number of residents potentially eligible for CETA and Title XX services. As a second phase of needs assessment, CETA and Title XX can survey a sample of CETA and Title XX eligible clients to determine what services they feel are most lacking, and what gaps in service could be filled by CETA and Title XX. A third phase of the needs assessment project can be to undertake a joint inventory of services existing in the community and determine how the inventory can be used to enhance information, referral and utilization of these services by CETA and Title XX clients.

On the basis of the inventory of resources and the sample of client service needs, CETA and Title XX planners can propose changes in program priorities and services to meet mutual client needs. These proposed changes can be weighed against the felt needs of the community. Both agencies can conduct public hearings so that community organizations and citizens might review the agencies' assessment of need and future service priority.

Changes in the state's annual services plan and CETA manpower plans can reflect an assessment of need based upon a statistical compilation of social indicators of demand, a sample of client service needs, an inventory of community resources, and a community review of agency services and priorities.

How Title XX Can Benefit
—The Title XX agency could improve its capacity to gather accurate information to forecast the need for the services it makes available to its clients.

—A joint-funded needs assessment project would reduce the cost of conducting this necessary activity.

How CETA Can Benefit
—A data base compatible with Title XX can enable CETA to gain an accurate assessment of its "most-in-need" population and an accurate count of the significant segments within it.

—Joint needs assessment could allow CETA to set its service priorities in conjunction with Title XX, though each could set different client priorities if desired.

Risks to Title XX
—That a local needs assessment conducted with CETA would be incompatible with the criteria set by the state Title XX agency.

—That the CETA Prime Sponsor needs assessment requirements do not take into account the broader range of service needs of Title XX, e.g., providing protective services to children, foster care services, etc.

Risks to CETA
—That Title XX will not involve its staff in an in-depth needs assessment because its priorities are really set by the state agency or legislature.

How to Reduce the Risks
—Explore jointly what needs assessment activities are required.

—Determine what additional data each local program must obtain to operate effectively.

—Develop a written agreement specifying the operational procedures for conducting a joint needs assessment project.

—Develop a work plan outlining the steps to be taken, what staff resources will be needed, and when each action step will be completed.

Opportunity 8: Human Resources Planning System

Issues Facing Title XX and CETA
Title XX and CETA have transferred program authority from the Federal government to state and local jurisdictions. The constraints of categorical funding have been lifted, allowing jurisdictions greater flexibility to design their own programs. Other Federally-funded programs, e.g., community development and health resources, are also moving in this direction. In short, there are now relatively few Federal statutory and regulatory constraints on state and sub-state human services planning and organization. The constraints now existing at the state and sub-state levels are often historical practices established in response to former Federal requirements.

State and local jurisdictions, particularly CETA and Title XX, have the means to eliminate many of these barriers and have the flexibility to develop an integrated human resources planning system.

How Coordination Can Help
The state Title XX agency and each CETA Prime Sponsor expend considerable resources on planning. Since both programs could serve the same client population and provide it with many similar services, there exists an obvious need for the programs to communicate with one another in a systematic fashion. The establishment of a continuous planning process could lead in the short run to better data exchange and in the long run to integrated planning.

How It Might Work
There exist several options for the development of an integrated planning system. The state Title XX agency and state CETA Prime Sponsor might designate a certain geographic area, e.g., a multi-county planning district served by a sub-state Council of Governments, as a pilot project. A local CETA Prime Sponsor, particularly a consortium, might join forces with a local Title XX district office.

Another option would be to develop a state and sub-state integrated human service planning system by phases. First, either by executive order or by legislative action, common planning boundaries might be established for CETA, Title XX and other programs under the state's jurisdiction. Second, the program year for the state's Title XX program could be changed, if necessary, to correspond to that of CETA. (However, CETA is required to run on the Federal fiscal year. Changing Title XX and other state human service programs to the Federal fiscal year might put these programs out of phase with the state's budgetary planning cycle and fiscal year.) Third, an integrated data base, including a joint computerized management information system, could be developed. Last, a common planning timetable, including reporting, needs assessment, program evaluation and budget planning, could be developed so that the planning steps of each program are complementary and in phase with one another. These steps could be taken concurrently or progressively as the need and resources permit.

An excellent resource for initiating a pilot project or for investigating how an integrated planning system might be developed would be the special CETA grant monies allocated to the Governor. The actual operation of the planning system, including its parts (needs assessment, common data management, evaluations, etc.) could be financed through Title XX so long as it is directly related to the administration and provision of Title XX services. Other allied service planning resources may be available, such as HUD-Title IV community planning assistance grants, general revenue sharing monies, health resources, and LEAA planning grants. All these services could benefit from an integrated planning system, but would have to pay for a proportionate share of the planning costs.

How Title XX Can Benefit
—The state Title XX agency would have access to additional resources for the development of its Comprehensive Annual Services Program (CASP) plan.

—The expenses for planning, needs assessment, and evaluation may be reduced.

—The coordination of the Title XX program to related human services programs would be improved.

How CETA Can Benefit
—CETA can be able to influence the development of the state's Title XX services plan to ensure the availability of needed social services to manpower clients.

—CETA can take into account resources outside CETA to meet the needs of CETA participants and can gain assistance in setting priorities.

Risks to Title XX
—That the progress of developing an integrated planning system will be so slow that Title XX will have to proceed independently.

—That the priorities of such planning mechanisms as regional Councils of Governments will differ from those of the Title XX agency, causing friction and delay in CASP plan development.

Risks to CETA
—That CETA will become involved with human service issues not directly pertinent to employment and training, thus lessening the impact of CETA.

—That the issues and steps involved in developing an integrated planning system are too complex for CETA as well as the other programs to handle.

—That CETA will lose some of its program authority for planning and setting priorities for services.

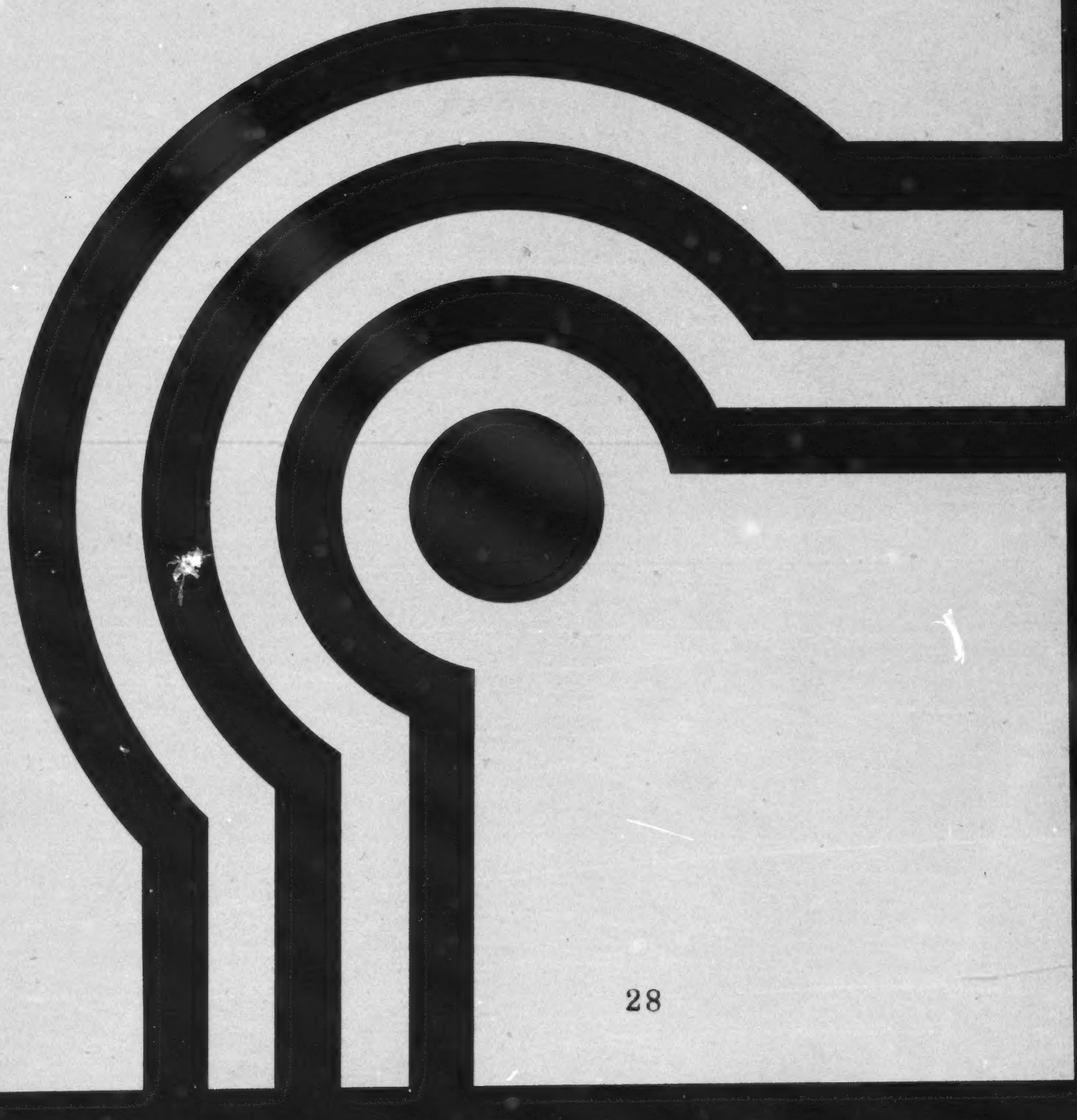
How to Reduce the Risks
—Agree to conduct a careful feasibility study and develop a realistic plan for establishing a human resources planning system before either Title XX or CETA commits its resources to undertake this project.

—Inform the chief elected officials about the risks of rushing into such a project too hastily, and involve them from the start in the planning process.

—Develop the means to establish the system in phases or on a pilot basis so as to not jeopardize the operations of the individual programs.

—Agree to proceed without delay to execute agreed-upon plans while keeping program staff, clients, and the community at large fully informed about the implications of the system and what is required to make it successful.

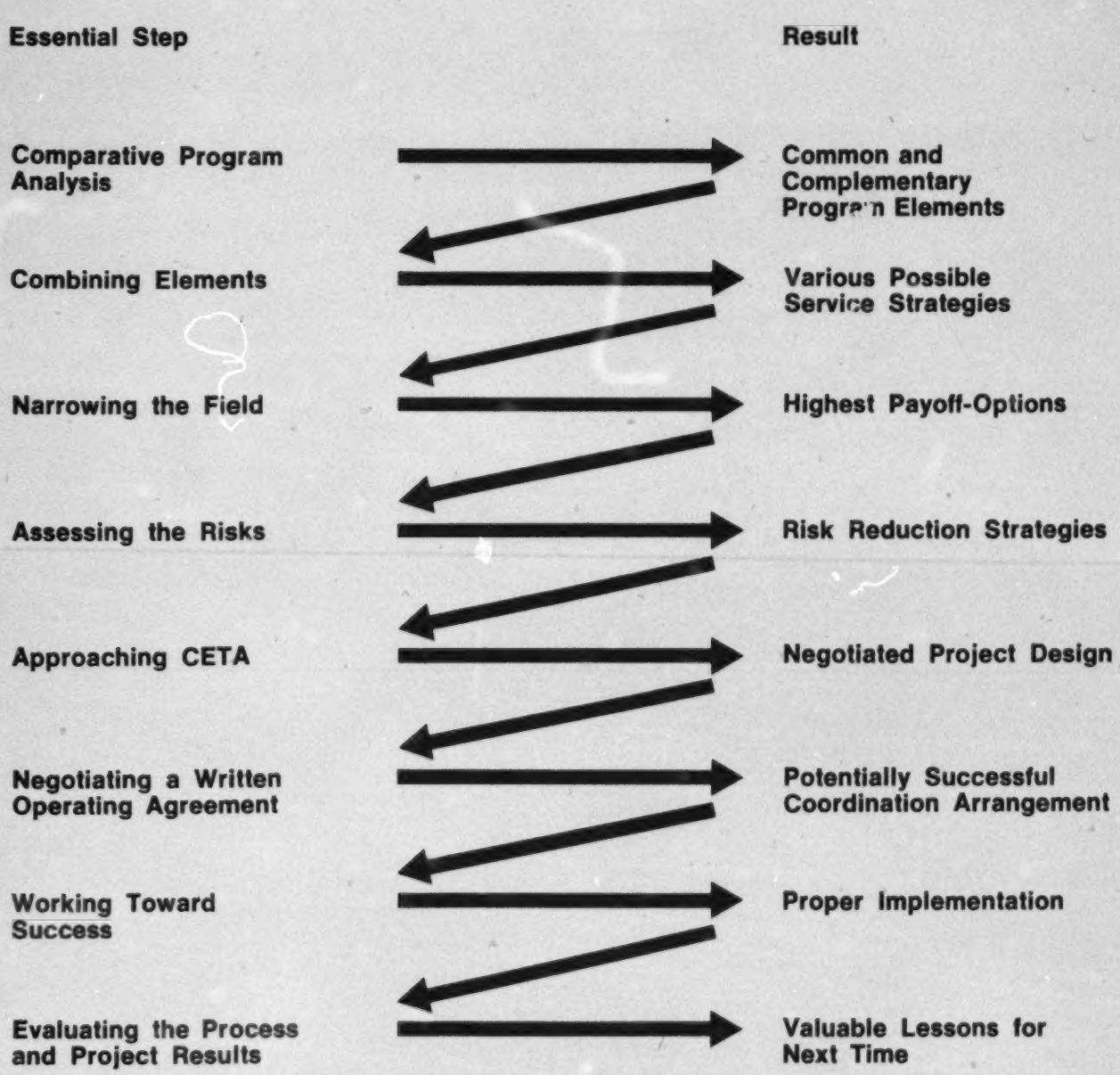
Chapter Four
Analysis, Identification and Implementation



This is a chapter on "process"—the process of identifying a coordination arrangement that makes sense in a particular Title XX/CETA setting, and the process of putting the identified arrangement into effective operation. Obvious Title XX/CETA coordination opportunities, particularly those with easily recognized high payoffs for both Title XX and CETA, are likely to present themselves to Title XX and CETA staff without detailed analysis. But the process described in this chapter may be useful to identify those less obvious opportunities which may be just as worthwhile. The specific coordination arrangements described in Chapter 3 were identified using this same process.

Essential steps in identification and implementation of worthwhile Title XX/CETA arrangements are presented in overview form on the next page. Each is discussed in some detail within this chapter.

Identification/ Implementation Process



Comparative Program Analysis

The first two major steps in comparative program analysis have been taken in the preparation of this guide. Title XX administrators are familiar with what issues and program concerns will be primary to their operations in the coming months, and a fairly detailed summary of CETA, legislation, guidelines, programming and administration has been included in Chapter 2. Paralleling that description are the most obvious and relevant comparisons which can be made with the Social Services program. By reviewing CETA's capabilities against known Title XX program needs administrators will begin to sense the most logical areas for joint action.

Clearly, in a document published and distributed nationally, the written description lacks local specificity. Additions to the description, with regard to how options are exercised in each jurisdiction, must be left to the Title XX and CETA staffs at the state and local levels.

What stands out in the national level comparisons of programs is how much they have in common. Their purposes, clients, and most particularly the flexibility they have with respect to resources, are remarkably similar. There are differences, too.

For example, Title XX services can help an individual to become more employable, but only CETA has the resources to create jobs. Moreover, there are differences in program emphasis and style. State Title XX programs tend to make available a variety of social services to improve one's social and psychological condition but often may not provide full means to attain self-support. On the other hand, CETA lacks the resources for adequate attention to social needs but has the resources to lead to jobs. Further comparison of Title XX and CETA, extending the basic comparison provided in Chapter 2, is likely to reveal a wide spectrum of both common and complementary program activities and emphases.

The Common Client

An AFDC or SSI recipent who is or can become job-ready *and* who is unemployed, underemployed or economically disadvantaged (according to the Title XX and CETA definitions, respectively) is eligible for both Title XX and CETA services.

The assumption that there exist common clients among these programs, however, should be examined more closely. Not all employable AFDC clients, for example, would necessarily fit the target priorities of a particular CETA Prime Sponsor. The pressure of attaining a high performance record of successful job placements may cause a Prime Sponsor to move the most employable into jobs first. The focus on "placing" welfare recipients (particularly those who participated in previous manpower training programs) often takes second priority.

Likewise, being unemployed, underemployed or economically disadvantaged does not necessarily indicate that the person is eligible for a particular state's social services program. Every state sets its own criteria for client eligibility for each service in each geographic area. The state's Title XX services directed at self-support may be focused upon the person most dependent upon public assistance. Those who are least dependent would seek services from other sources, such as CETA. (This is particularly true in states and counties which do not have an AFDC-Unemployed Fathers Program.)

The employable AFDC or SSI recipient may be a common client, but he or she may also be a second priority group for both programs. The irony of this situation is that the statutory goals of both Title XX and CETA presume each will serve this common client population. Joint Title XX/CETA efforts to develop common client eligibility criteria and priorities can be productive toward attaining together the self-support goals of both programs.

Combining Elements

Reviewing the common elements identified in Chapter 2, or a local analysis, enables development of strategies for coordinating program services to take advantage of those commonalities. As is illustrated by the series of coordination examples in Chapter 3, basic combinations seem to be:

1. *The Identification Effort.* The parties to a coordination agreement jointly assess client needs, plan complementary services, and screen and classify potential clients. The possibilities range from simple cross-referral to integrated staff units performing service activities for mutual clients.

2. *Sequential Services.* This calls for Title XX preparation of a common client to take advantage of a CETA-administered cluster of employability development services. The client passes from the Title XX program to CETA, then into the labor market.

3. *Concurrent Services.* The client is served according to a jointly prepared Social Service/Employability Development Plan, whereby various needs are responded to concurrently by Title XX and CETA staff, with details of service responsibility vis-á-vis that client worked out in advance.

To this point, the process is analytical. The underlying purpose, so far, is to identify all significant possibilities with respect to clients, client services and joint service potentials for which Title XX and CETA could coordinate. The next step begins that part of the process which involves selecting the best option, making it as appealing as possible to both Title XX and CETA, and working out the details of project agreement.

Narrowing the Field

Two major kinds of considerations, over and above the obvious concern for the welfare of the common client, will help in narrowing the field of opportunities to those with the highest payoff for both Title XX and CETA; those, therefore, with the highest probability of success. First, the alternatives selected should contribute to resolution of the most significant issues facing both Title XX and CETA. Second, the arrangements to be considered need to be consistent with the objectives of any agency administrator.

"Scientific method" calls for systematically weighing each option or alternative against the priorities, issues and objectives, and selecting the arrangement which meets "most of the highest ranked" objectives. But, in fact, coordination activities seldom lend themselves in total to such rigorous analysis. In practice, the most appealing option in a particular context generally stands out visibly, far in front of the others.

Once singled out as potentially attractive, a basic project or option can often be strengthened considerably by reviewing priorities, issues and objectives from the perspective of a coordination project design rather than from a single program evaluation. The basic project concept might be modified or supplemented *in response to* particular issues like those listed below that are known to be strong concerns of Title XX or CETA administrators. Coordination arrangements which meet multiple objectives normally generate proportionally more support than those which meet only one.

Significant CETA Issues

Individual issues can always be identified as major strategic concerns of either Title XX or CETA programs.

Though these may change over time, certain issues are clearly on the minds of Social Services and CETA administrators as FY '77 approaches. If each can understand the other's current priorities, and if coordination arrangements developed act simultaneously on both Title XX and CETA priorities, then those arrangements can expect the full support of both parties to the agreement.

Just as Title XX administrators must devise strategies for new state social services programs with limited resources and without abandoning current clients, each CETA administrator is feeling pressure on some of the following issues:

1. *Performance emphasis.* Employment and Training Administration goals and objectives for FY '76 included the natural shift from *implementation* of the first year program to increased *performance* in serving clients. Mentioned first among performance criteria are *program mix* and *client groups* served.

2. *Building capability.* CETA Prime Sponsors are in various stages of organizational development and stabilization. Those Prime Sponsors which have not completed development of their organizational structures and operating procedures may not be attracted to arrangements which place additional administrative burdens on them.

3. *Finding jobs.* Few Prime Sponsors can find enough jobs to meet the needs of their clients. The private sector is still in a period of recovery, and many Prime Sponsors report that the public sector is approaching saturation with transitional public service jobs. Yet certain target groups, like the handicapped, benefit from both advertising and efforts toward "corporate responsibility" which could make finding jobs for this group relatively easier than for the traditional clients of CETA Prime Sponsors.

4. *Spending the grant.* Some Prime Sponsors, under the same pressure to spend their grants within the grant period as any other Federal grant recipient, reported difficulty in developing productive uses for a portion of their grant funds during the first year and a half of CETA implementation, due in part to the compressed operational cycle. Many elected a strategy of entering "external arrangements" to absorb remaining funds. Should additional legislation or increased allocations be introduced, Prime Sponsors might find themselves facing a similar situation.

5. *Serving the "most-in-need".* CETA legislation requires that Prime Sponsors give priority to those in their population who are most in need of CETA services. However, two factors inhibit efforts to do so. One, pressures on performance and placements, is discussed above. Additionally, Prime Sponsors have developed only very limited technical capabilities to serve population groups such as welfare recipients. Many Prime Sponsors may well be interested in Title XX's capability in this area.

6. *Cost per placement.* The Employment and Training Administration (that arm of DOL which oversees CETA) places great weight on this measure of Prime Sponsor performance. There are Prime Sponsors who would welcome any reasonable suggestion about how to lower average cost per placement. Conversely, there are Prime Sponsors with the opposite problem: they are accused of "creaming" because their cost per placement is low.

7. *Valid data on "significant segments".* Prime sponsors would, in most cases, welcome valid data on target groups who ought to be included as "significant segments" in their annual grant proposals. The required analysis should be straightforward and objective but often lacks reliable data which the Title XX agency may have available.

8. *Manpower Planning Councils and State Manpower Services Councils.* These councils, required by the Act, are operating in a wide range of roles and relationships to the various state and substate jurisdictions. A current priority of the Employment and Training Administration is to strengthen the councils in the roles envisioned for them by Congress and the Labor Department.

The Administrator's Objectives

In addition to positive impact on the above CETA priorities and issues, high payoff coordination arrangements should meet some objectives of the agency/program administrator for improved activity. The three categories of objectives might be grouped thus:

1. Improved Service Delivery

(a) through expanded service

(b) through addition of services

2. Improved Resource Utilization

(a) through access to untapped resources

(b) through better focused resources

3. Improved Program Operations

(a) through a strengthened information base

(b) reflected in higher performance

(c) through a supply of qualified, entry-level staff.

Improved Service Delivery

(a) *Through expanded service.* Joint service to common clients permits each agency either to serve more clients with the same resources or (looking at it the other way) to provide substantially expanded services to existing clients at no extra cost to either agency.

(b) *Through addition of services.* Title XX and CETA, sharing the costs and responsibilities of serving clients, can also share the cost of services which might be infeasible for either without some form of cost-sharing. These additional services, of course, can be purchased jointly, depending on availability and reliability of a third party to provide them.

Improved Resource Utilization

(a) *Through access to untapped resources.* Coordination can make possible access to funds not otherwise available to either party. Research and demonstration funds earmarked for coordination experiments are an obvious example. Many HEW-backed initiatives (e.g., the Nurse Training Act of 1975) include legislatively authorized *training programs* which CETA could organize and in which Title XX clients could participate.

(b) *Through better-focused resources.* Several illustrations of shared funding for common clients have been mentioned above. Any resulting relief of the Title XX financial burden for its current clients would permit shifting of freed funds to expand services into other needed areas.

Improved Program Operations

(a) *Through a strengthened information base.* With the labor market information CETA planners gather for their own purposes, Title XX counselors could make better-informed decisions as to how to guide clients toward their employment goals. With an accurate up-to-date inventory of social services in their jurisdiction, CETA might be persuaded to identify and make available training resources and PSE job slots for Title XX agencies and providers. Reporting requirements placed on Prime Sponsors would then become an active force toward service to welfare recipients since CETA Prime Sponsors must report progress in serving "significant segments" identified in their proposals.

(b) *Reflected in higher performance.* Where Title XX and CETA share responsibility for a common client, the end result is higher reported performance for both programs (since Title XX's success is measured by helping a client gain economic self-support, and CETA's by a "positive termination"). While in one sense this is double-counting, from the client's perspective it is coordinated service with a positive outcome that neither program could provide alone and at the same level of expenditure. In that client's case, a simple reporting incentive may have played a role in achieving *better results* than otherwise might have been possible.

(c) *Through a supply of qualified, entry-level staff.* While Title XX can tap Federal dollars above the Title XX ceiling for purposes of training, CETA can provide a PSE subsidy for professional and paraprofessional service delivery staff.

Assessing the Risks

Steps in the analytic process up to this point will have assisted in identifying and assessing the benefits to organizational objectives and clients of possible coordination arrangements. They will also have enabled a relative judgment as to which among several potential opportunities might have the greatest likely benefit.

Prior to proceeding it is wise to assess the internal environment in which a coordination arrangement must operate. Here agency leadership will be crucial. Often non-standard projects such as coordination fail to achieve their potential because those pursuing coordination fail at the outset to anticipate fully the nature or magnitude of potential obstacles or, when confronted with those obstacles, are unable to invest the efforts required to steer the initiative around them. Before moving forward it is essential to assess agency commitment to achieving the results of coordination and the time and effort such commitment will demand.

Organizational disruption and resistance to change are bound to accompany new operating and administrative arrangements with an agency. The resistance, moreover, is often unconscious. People continue in the old ways out of habit, simply forgetting to adapt to the required change. The experienced administrator, however, will assume that these obstacles are part of the price to be paid for coordination. And, keeping an eye on the potential benefits, he or she will take appropriate action to head-off or remove the inevitable obstacles. Among the factors that should be assessed are:

—organizational and administrative factors

—political implications

—personality considerations

—the Federal agency position.

This can be carried out informally and unofficially. It is usually counterproductive to involve more than a small group at this stage in the process, until agency leadership has decided that the overall situation is favorable to the initiative being proposed. If your analysis of the opportunities and your current agency situation reveals strong potential for success, then conversations with others can begin.

Organizational/Administrative Factors

Organizational and administrative considerations may have the most immediate impact on success or failure. It is unlikely that coordination objectives will be realized in the absence of cohesive internal support in either program. On the other hand, internal issues represent the area over which you have greatest influence, and early recognition of potential internal problems can lead to their successful resolution. Following is a list of several organizational considerations that might be reviewed.

Organization/Administration

☐ What components of your organization will be most affected by the proposed coordination? Are there components that will be affected indirectly (budget, payroll) rather than through direct involvement?

☐ What do you already know about your own program components' probable willingness to cooperate?

☐ Which individuals within your organization will be most supportive of your proposal? Which do you think will offer the most resistance?

☐ Are there performance goals that will be affected positively or negatively by the coordination effort?

☐ Are there any internal organization "political" issues that might affect coordination efforts?

☐ What do you currently know about the organization with which you will be dealing regarding the above questions?

☐ With which individuals in the counterpart organization do you currently have strong relationships?

☐ Who in the counterpart organization is in a position to make the kinds of decisions you think will be needed to accomplish the proposed coordination?

☐ Is there any prior history of coordination attempts between the two programs that might enhance or interfere with your current undertaking?

☐ Are there other organizational relationships (e.g., advisory groups) that have to be taken into account while pursuing coordination?

☐ Are there existing procedural requirements of which you are aware that will be obstacles to achieving coordination?

☐ Is there any prior history of attempts at modifying procedural requirements in the manner envisioned?

☐ Who in your own organization is in a position to accomplish procedural modification? How long will it require?

Political Implications

In recommending that decision-makers consider the political environment when assessing coordination opportunities it would seem that, rather than politicizing the issues, proper identification of existing political concerns that may affect coordination is necessary in order to take advantage of supportive policies of the Chief Elected Official (CEO), to reduce the chances that political issues may overrun the project and to avoid embarrassment to that official and to the agency. Where the objectives of the project and the aims of the CEO coincide, prospects of success are significantly bolstered. (See the checklist which follows.)

Political Environment

☐ What attractions or risks might your proposal for coordination hold for the Chief Elected Official (CEO)?

☐ Has the CEO or any of his representatives expressed a public position on the type of initiative you are proposing?

☐ Are there minor modifications to your proposal that would not affect the desired outcomes but which would make it more acceptable to the CEO?

☐ Will the planned undertaking involve groups within the community or external organizations which might indirectly involve the CEO (e.g., appointed advisory groups, etc.)?

☐ Will the proposed undertaking require the formal approval of the CEO? Tacit approval? Is any direct action by the CEO required?

☐ How is access to the CEO best achieved (directly; through others)? If intermediaries are involved, do they represent additional obstacles? What is needed to convince them?

☐ If CEO involvement is advisable, when is the best time, for him and for you, to introduce your proposals to him?

☐ Does your program or the program with which you will be dealing have a prior history of political controversy that is likely to affect your efforts?

☐ Are there legislative committees whose approval will be necessary to carry out the project? What is the best way to deal with them and who is best to do it?

Personalities
A realistic appraisal of the situation must consider the personalities of all those who will be involved. The tendencies, approaches, styles, and idiosyncracies of the various individuals must be counted.

A review of individuals should also include an assessment, if possible, of the characteristics of key CETA management so Title XX will be best prepared to present the project in the most appealing fashion.

The Federal Position
Both Title XX and CETA are dominated by the presence of Federal dollars. Even though agency autonomy in program activity is high, coordination initiatives are not likely to succeed without Federal support. In certain cases, Federal officials can be of value in removing obstacles to success, such as the granting of formal waivers or informal approval of a use of funds. Assessing early the potential benefits and/or problems that the Federal sector can bring to the effort will enable deliberate actions to take advantage of the benefits and minimize the problems.

The HEW Regional Director's manpower coordination unit, headed by the Regional Manpower Coordinator, exists for just the purpose of assisting state and local program operators and CETA Prime Sponsors to work together more effectively. This staff has in recent months conducted detailed analyses of the operation of HEW programs in each state and is accordingly well-versed in the basic issues.

The Regional Manpower Coordinator will not attempt to deal with individual program issues, which are properly the responsibility of state and national agencies, Prime Sponsors, or the Department of Labor, but will be available to assist *where requested* with the analysis, design or implementation of coordination opportunities.

A list of Regional Manpower Coordinators is included as an appendix to this guide.

Reducing the Risks
Each potential coordination arrangement will include certain risks as a part of its design. These risks are real and cannot be ignored in developing a successful agreement to implement the arrangement. The illustrative coordination arrangements in Chapter 3 specify major risks likely to be perceived by Title XX and CETA staffs and the actions that could be taken to reduce each risk. Similar analysis by Title XX staff for other coordination options will generate similar indications of likely risk areas.

Early identification of potential risks can assist in making a final decision whether to proceed. It can also identify immediate actions that can be taken to reduce the risk. Once the project is underway, however, the most significant risks will develop: those operating problems which may cause failure through lack of communication or absence of mutual agreement. A thorough written operating agreement (about which more later) will do much to prevent these occurrences. Identified risks can be addressed in the agreement and specific actions to prevent their occurrence laid out.

Approaching CETA
Heretofore, the program analysis and review of benefits and risks have likely been conducted only verbally. It is wise at this point to develop, for limited internal use only, a written description of the present conceptualization of the project. Doing so provides a second look at some of the assumptions underlying the project, helps identify potential areas, and often provides the first opportunity to specify the actual negotiation and implementation steps that will need to take place.

This project description need not (should not) be a formal document. Rather, it provides a rigorous review of the pros and cons of the project before discussing it with CETA and provides a "script" for explaining the project to others. It should include:

—What results (benefits) are expected;

—Why they are best achieved through coordination;

—With what specific programs and agencies it is appropriate to coordinate;

—What benefits will be attractive to that program/agency;

—Disadvantages which are readily apparent and which must be overcome;

—Obstacles and risks, and strategies for their reduction;

—Specific steps each participating agency must take in order to get the project under way and in order to to carry it out.

Activities to this point in analyzing the benefits and risks (internal and external) of a coordination project should provide good preparation for the discussions with others that will follow. Consider several basics, though, before proceeding.

—The benefits of coordination must be as clearly perceived by CETA as they are by Title XX. If both organizations don't feel they will gain, the project will fail.

—The more individuals actively involved in negotiating a coordination agreement, the higher is the probability that progress will break down before agreement is reached.

—Early support of individuals in key decision-making capacities can make the process easier, but it is essential that the merits of the proposal be argued convincingly while risks are presented in proper perspective.

—Resistance to change will occur within both Title XX and the Prime Sponsor's organization, but realistic strategies can be developed to overcome it. Habit, tradition, and fear for one's role in a new system are powerful deterrents to cooperation. If you anticipate them, you can deal with them on an individual-by-individual basis. If you ignore them, the resistance can gather momentum and severely compromise the goals of the project.

—When planning to implement a coordination proposal, be as realistic as possible about what can be controlled or influenced and what is beyond current agency capability or capacity.

At this point, discussions with a counterpart in the other organization can begin with realistic chance of success. Initial discussions seldom result in immediate agreement, though. The individual with whom you are dealing will need time for internal assessment of the benefits and risks from his/her perspective. Therefore, it is important in first discussions to:

—Introduce the proposal logically and as simply as possible, stressing the benefits to both agencies and to both agencies' clients.

—Stay away from premature discussions of organizational implications, budgets, authority, or other issues that involve "turf."

—Try to view the initial reactions of the counterpart from that program's perspective. Remember a person is not convinced merely because his objections have been silenced.

If the initial discussions are successful, there should be basic agreement as to the value of proceeding further. The first step therein should be the development of specific, mutually agreeable, realistic results for the project. In determining what is realistic, both VR and CETA should together:

—Review all original expectations for the project and modify them as necessary to be satisfactory to each organization.

—Agree on the specific results that are expected from the coordination proposed; when this is achieved, put them in writing.

—Exchange frank views on what constraints and obstacles to the proposal exist from the point of view of each agency, based on both internal and external analyses.

Once there is agreement on the results that both parties expect and the issues each thinks will arise as those results are pursued, it is necessary to design the operating details of the project and to record them in a written agreement. Developing the project plan is critical in one very special way: it is the initial test as to whether or not both programs can work together toward a common purpose.

Key officials of the agencies involved should agree on:

—Specific actions/decisions that must take place prior to the signing of an agreement. This should include items such as procedural waivers, legal opinions, authority to enter into financial arrangements, broad organizational requirements, etc.

—Specific individuals or other agencies that will need to be involved. These should be those individuals in a position to approve the specific actions or decisions listed above.

—Strategy and timing for involving key individuals, particularly the Governor, if required, and other highly placed individuals, e.g., legislators, state budget bureau, etc. Plans should include identification of issues that should be resolved prior to soliciting support and identification of arguments that will be most persuasive in gaining their support.

—A schedule for completing the agreement. This should detail the schedule on which each action item or decision should take place and should specify individuals responsible for accomplishing each item.

Negotiating a Written Operating Agreement

Two steps remain in putting the project into operation:

—Finalizing a written agreement that will specify the way coordination will take place.

—Working together to carry out elements of the plan.

Both steps will probably move forward concurrently. In many cases the agreement will not (and need not) be a formal *contract* between agencies. Rather, the written agreement serves as a document which ensures that all staff participants in the project, particularly those who were not a part of its development, understand the results to be achieved and the various assignments that will ensure their accomplishment.

Note: An unwritten agreement is not an agreement at all—it is an understanding and understandings are easily misinterpreted as time goes by. If programs have something worth doing together then it is worth taking the time to record the details properly. Everyone will have invested far too much time and energy by the time actual coordination activities are scheduled to start to base success on memories, impressions, or prior perceptions of what was agreed.

A written operating agreement is very different from a legal enabling agreement between the agencies. Because, in the eyes of many, detailed "agreements" are synonomous with contracts, they are frequently avoided as unnecessary or restrictive. In other cases agencies sign agreements establishing the legal basis for coordinating but omit the necessary detailed description of how that coordination will take place. In either case, the result is usually confusion and misunderstanding at the operating level, requiring considerable time to discuss what was supposed to happen and in what way. In fact, absence of a written operating agreement can cause the project to begin wrong or too late, dooming it from the start. It only takes limited experiences of this nature before both parties are ready to concede that it is easier to work alone.

Although they may vary widely in format and language, all good agreements state, at a minimum:

1. Precisely what is to be accomplished between the two parties (purpose, reason for coordinating).

2. The situations in which the agreement will apply.

3. A summary of the agency activities that are affected by coordination and the way in which these activities will be expected to serve the coordination project.

4. Who, in each organization, is responsible for the specific activities listed.

5. What will constitute service standards, response time, etc. (e.g., provision of counseling interviews within 5 days of request).

6. Administrative procedures (reporting procedures, supervision, etc.).

7. How and how often service standards will be reviewed.

8. Modification procedures.

9. Financial arrangements.

An agreement that covers the above items leaves little room for debate on what was intended, what was supposed to occur, when it supposed to occur, or who was responsible. Although it is more difficult to agree on that kind of detail than it is to wait and "work things out" once the project begins, your work in putting together a good agreement will be more than offset by the strengthened, predictable nature of the coordination which results.

An example of a complete operating agreement is included as Appendix I.

Working Toward Success

Once the project is underway, the challenge to all participants is keeping the initiative moving forward despite whatever obstacles may arise. If major obstacles have been anticipated, the task will be easier, but under no circumstances will a new and different experience such as this be easy. Offered below are some tips on keeping the initiative on track.

1. Expect problems and budget enough time (both calendar time and person-hours) to deal with them. Even the most thorough planning cannot account for all contingencies.

2. When lack of progress in any one specific area threatens the undertaking, review the original agreement on benefits, particularly those accruing to clients, and the agreement to date, emphasizing where the ability to resolve issues has already been demonstrated.

3 Keep in mind that individuals in both organizations have the same kinds of concerns (political, personalities, regulations) and that both must decide how and with what speed to deal with internal issues.

4. If unable to resolve an issue that is critical to the success of the project, don't move ahead until it is resolved (see item 1 above). There is almost never reason to expect that resolution will become easier in the future.

5. Don't let individuals involved in implementing a coordination strategy get so involved in the *process* of accomplishing it that they forget why they wanted it in the first place.

6. Plan the work with a view toward conflicting or competing time requirements. If, for instance, the major activity in preparing for coordination must occur simultaneously with final preparation of the yearly program plan or an agency reorganization, chances are coordination will come in second—and last.

7. Once it has been decided that coordination will in fact take place, internal staff of both programs should be thoroughly oriented as to what this means for them and what will be expected of them. If staff is involved at the proper time, they are likely to have more of an interest in and commitment to the success of the effort.

Evaluating the Process and Project Results

If agencies agree to proceed on a coordinated approach to service delivery, they should make certain that both agencies profit from the experience and, if successful or not, learn why.

To gain this knowledge, which will be very valuable in designing future activities, some form of evaluation of the results of the project *and the processes that took place* will be needed. While that evaluation is not the subject of this guide, it is clear that whatever form the evaluation takes (simple or complex, formal or informal, quantitative or qualitative) the written operating agreement will provide the basic record of what the project set out to do. From this, any intentional or unintentional deviations can be measured and analyzed.

Appendix One

Illustrative Agreement
The following agreement is offered as an illustration in accordance with the principles set forth in Chapter Four.

I. Purpose
The intent of this letter of Agreement is to provide the citizens who are in need of certain manpower and supportive services with the most effective and comprehensive means of achieving maximum self-help. These services can be best provided by the joint efforts of the Comprehensive Employment Training Act Balance-of-State (hereinafter referred to as CETA-BOS) and the Social Services Agency (hereinafter referred to as SSA).

Recognizing that both agencies have common goals and deal with similar target populations to enhance the capacity of the economically disadvantaged to become self-supporting, this Agreement establishes coordination policies and linkages in the delivery of services between CETA-BOS and SSA to common clients. A common client is one who has qualified for the services of both agencies in accordance with the respective criteria of each agency.

A. Administration
Personnel from both agencies will routinely function under the rules, regulations and policies of their respective agency and neither agency shall have the authority to negotiate or otherwise render ineffective the other agency's current operating procedures.

Each agency will designate a representative to monitor the Agreement, such representatives to be responsible to their respective agencies for administration of the Agreement.

B. Meetings
These coordinators may call joint staff meetings if necessary for furthering the communication, coordination, and linkage between both agencies. The representatives shall meet at least quarterly.

II. Commitments

A. Mutual Responsibilities

1. Exchange and disseminate a listing of programs, eligibility requirements, office locations, and services provided.

2. Provide information on common clients to assure appropriate utilization of program monies and avoid duplication of services. This information will be confidential and can only be used for the expressed purpose at the time of release.

3. Orient the staff to the other agency's policies, practices and services.

4. Call meetings on a regular basis between each agency's counterparts (Director/Director, Planners/Planners, Counselors/Counselors, etc.) to assure a stable channel of communication between staffs regarding needed information and mutual problems.

5. Provide joint and separate pre-service and in-service training sessions for staffs to increase awareness and to update and improve services and client/staff, staff/staff relationships.

6. Submit annual plans to the State Manpower Services Council (SMSC) for coordination at the planning level and input into the State's Comprehensive Manpower Plan and into the State's Comprehensive Annual Services Program Plan.

7. Delivery of Services:

a. Establish a "common client" relationship which will involve an exchange of services by both agencies.

b. SSA will provide such services as health-related services, family planning services, and day care services for children. CETA will be responsible for providing such basic services as allowances, job development and job placement.

B. BOS Responsibilities

1. Screen and inform any current CETA enrollee about any SSA service for which the client is eligible.

2. Provide SSA with program information about CETA to distribute to Title XX clients.

3. Accept SSA and WIN referrals to CETA programs as appropriate.

This Agreement will take effect on the date both co-signers affix their signatures and will be renewable verbally prior to the end of each twelve-month period by the signers. It will be effective as long as each party has sufficient funds to meet the above-mentioned obligations or until both parties mutually decide to cancel.

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